REMARKS/ARGUMENTS

Claims 1-20 were previously pending in the application. Claim 8 is amended; and new claims 21-24 are added herein. Assuming the entry of this amendment, claims 1-24 are now pending in the application. The Applicant hereby requests further examination and reconsideration of the application in view of the foregoing amendments and these remarks.

Miscellaneous Amendments

The Specification has been amended to correct inadvertent typographical errors on pages 27 and 52.

Claim 8 has been amended to correct an inadvertent typographical error. This amendment was not made to overcome any prior-art rejection.

Prior-Art Rejections

In pages 2-8, the Examiner rejected claims 1-11 and 14-20 under 35 U.S.C. 102(e) as being anticipated by Lin et al. (U.S. Pat. App. Pub. 2003/0065811 A1). In pages 8-10, the Examiner rejected claims 12-13 under 35 U.S.C. 103(a) as being unpatentable over Lin in view of Mo et al. (U.S. Pat. App. Pub. 2003/00372276). For the following reasons, the Applicant submits that all of the now-pending claim are allowable over the cited references.

Claims 1 and 14

The Examiner rejected claim 1 based on the alleged teachings in Lin. In particular, according to the Examiner, Lin discloses all of the claimed features, including the step of "receiving a service data structure comprising an identification of each link and transit node in a primary path for the service," performed "at a regional manager for one or more transit nodes of the restoration path." The Examiner cited paragraph 34 ("the primary path is determined") of Lin as specifically teaching this step. While paragraph 34 discloses that "Once the pairs of disjoint paths are determined, how much bandwidth to allocate on each link is determined," it says nothing about a service data structure comprising an identification of each link and transit node in a primary path for the service. Furthermore, Lin does not disclose the receipt of the service data structure at a regional manager for one or more transit nodes of the restoration path. Lin's disclosure of transmissions is limited to items such as failure notifications, acknowledgements, keep-alive signals, payload data, and connection identifications.

According to the Examiner, Lin also discloses the step of "determining whether to reserve additional protection bandwidth . . . using the service data structure." The Examiner

cites paragraph 35, lines 16-28 as specifically teaching this step. However, paragraph 35 does not disclose use of the requisite service data structure identifying each link and transit node in a primary path for the service. Instead, paragraph 35 teaches using a list of all the links in the network, which is a different data set.

The Applicant submits therefore that claim 1 is allowable over Lin. For similar reasons, Applicant submits that claim 14 is also allowable over Lin. Since claims 2-13 depend variously from claim 1, and claims 15-20 depend variously from claim 14, it is further submitted that those claims are also allowable over Lin.

Claims 4 and 17

The Examiner rejected claim 4 based on the alleged teachings in Lin. In particular, according to the Examiner, Lin discloses all of the claimed features, including the step of "transmitting from the regional manager information about the additional protection bandwidth for communication to each other node in the network." The Examiner cited paragraph 63 of Lin as specifically teaching this step ("each node may maintain an updated table"). The only updating specifically disclosed in Lin is in paragraph 65, where Lin discloses updating the unit tables on nodes along the protection path. The cited paragraph 63 discloses each node having two tables: (i) a routing table specifying upstream and downstream links for connection ID's whose protection route contains the particular node and (ii) a unit table of fibers and wavelengths on links incident to the particular node. The cited paragraph does not disclose <u>transmittal</u> of <u>additional protection bandwidth information</u> to <u>each</u> other node in the network.

The Applicant submits that this provides additional reasons for the allowability of claim 4 over Lin. For similar reasons, Applicant submits that this provides additional reasons for the allowability of claim 17 over Lin.

Claims 5 and 18

The Examiner rejected claim 5 based on the alleged teachings in Lin. In particular, according to the Examiner, Lin discloses all of the claimed features, including that "the service data structure is a primary path vector having a plurality of entries corresponding to the nodes and links in the network." Nowhere does Lin disclose using vectors for any purpose, let alone to serve as service data structures and have a plurality of entries corresponding to the nodes and links in the network.

The Applicant submits that this provides additional reasons for the allowability of claim 5 over Lin. For similar reasons, Applicant submits that this provides additional reasons for the allowability of claim 18 over Lin. Since claim 6 depends from claim 5 and claim 19 depends from claim 18, it is further submitted that this provides additional reasons for the allowability of those claims over Lin.

Claim 9

The Examiner rejected claim 9 based on the alleged teachings in Lin. In particular, according to the Examiner, Lin discloses that "the network data structure is an array of vectors, wherein: each vector in the array corresponds to a different link in the network; each vector in the array has a plurality of entries corresponding to the nodes and links in the network," and that "the service data structure is a primary path vector having a plurality of entries corresponding to the nodes and links in the network." Nowhere does Lin disclose vectors of any kind, let alone vectors corresponding to the nodes and links in the network.

The Applicants submits that this provides additional reasons for the allowability of claim 9 over Lin. Since claims 10-11 depend variously from claim 9, it is further submitted that this provides additional reasons for the allowability of those claims over Lin.

Claim 10

The Examiner rejected claim 10 based on the alleged teachings in Lin. In particular, according to the Examiner, Lin discloses all of the claimed features, including the step of "applying a vector addition operation between the primary path vector corresponding to the service and the vector of the array corresponding to the outgoing link." Nowhere does Lin disclose using vectors for any purpose, let alone adding them.

The Applicant submits that this provides additional reasons for the allowability of claim 10 over Lin. Since claim 11 depends from claim 10, it is further submitted that this provides additional reasons for the allowability of claim 11 over Lin.

Claim 21

Support for new claim 21 is found in original claim 1, and in the Specification at pages 13-14. Lin does not teach or even suggest such a combination of features. For example, Line does not teach or even suggest receipt of a data record comprising an identification of each link and node in the primary service path. As such, the Applicant submits that new claim 21 is

allowable over Lin. Since new claims 22-24 depend from claim 21, it is further submitted that those claims are also allowable over Lin.

In view of the above amendments and remarks, the Applicant believes that the now-pending claims are in condition for allowance. Therefore, the Applicant believes that the entire application is now in condition for allowance, and early and favorable action is respectfully solicited.

Respectfully submitted,

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